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10 Attorneys for Defendant
11 National Consumer Telecom & Utilities Exchange, Inc.

12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 JAMES MOLINARO,

15 Case No. 2:21-cv-01948-JCM-BNW

16 Plaintiff,

17 v.

18 NATIONAL CONSUMER TELECOM &
19 UTILITIES EXCHANGE, INC.,

20 Defendant.

21 **AMENDED STIPULATION FOR
EXTENSION OF TIME FOR
NATIONAL CONSUMER
TELECOM & UTILITIES
EXCHANGE, INC. TO FILE
RESPONSE TO COMPLAINT**
22 **(SECOND REQUEST)**

23 Defendant National Consumer Telecom & Utilities Exchange, Inc. (“Defendant” or
24 “NCTUE”), by and through its counsel of record, the law firm Greene Infuso, LLP, and Plaintiff
25 James Molinaro (“Plaintiff” or “Molinaro”), by and through his counsel of record, the law firm of
26 Krieger Law Group, LLC, hereby stipulate and agree as follows:

27 WHEREAS, Plaintiff filed its Complaint on October 22, 2021;

28 WHEREAS, Defendant NCTUE’S deadline to respond to Plaintiff’s Complaint was
December 20, 2021;

WHEREAS, due to settlement discussions between the parties that commenced on
December 20, 2021, Plaintiff agreed that late that day that NCTUE may have an extension to
respond to the Complaint to facilitate the parties’ efforts to resolve this matter without the need for
further litigation;

1 WHEREAS, the parties were unable to coordinate the preparation, review, execution and
2 filing of a stipulation to extend NCTUE's deadline to respond to Plaintiff's Complaint until
3 December 22, 2022 as a result of the parties' schedules and efforts directed towards resolving this
4 matter;

5 WHEREAS, the parties continue to engage in settlement discussions and have agreed that
6 NCTUE may have until January 27, 2022 in which to respond to Plaintiff's Complaint.

7 WHEREAS, there are no other deadlines that are affected by this stipulation that are
8 presently known to the parties; and

9 WHEREAS, this stipulation is not entered into for any improper purpose or to delay;

10 THEREFORE, Plaintiff and NCTUE hereby stipulate and agree that NCTUE may have up
11 through January 27, 2022 in which to respond to Plaintiff's Complaint.

12 Respectfully Submitted by:

13 **GREENE INFUSO, LLP**

14 _____
15 /s/ Michael V. Infuso
16 Michael V. Infuso, Esq.
17 Nevada Bar No. 7388
18 Keith W. Barlow, Esq.
19 Nevada Bar No. 12689
20 3030 South Jones Blvd. Suite 101
21 Las Vegas, Nevada 89146

Approved by:

KRIEGER LAW GROUP, LLC

/s/ Shawn Miller, Esq.
David Krieger, Esq.
Nevada Bar No. 9086
Shawn Miller, Esq.
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2850 W. Horizon Ridge Pkwy
Suite 200
Henderson, Nevada 89052

22 **O R D E R**

23 **IT IS SO ORDERED.**

24 Dated this 21st day of January, 2022.

25 _____
26 
27 _____
28 United States Magistrate Judge